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OCT 04 2000

Mr. James A. Saric, Remedial Project Manager
U.S. Environmental Protection Agency
Region V, SRF-5J
77 West Jackson Boulevard
Chicago, IL 60604-3590

DOE-1057-00

Dear Mr. Saric:

RESPONSE TO CONCERNS ABOUT INCREASES IN FENCELINE DOSE LEVELS

Reference: Letter, J. Saric to J. Reising, Integrated Environmental Monitoring Plan First Quarter 2000 Report, dated August 1, 2000

The U.S. Department of Energy (DOE) has reviewed the U.S. Environmental Protection Agency's (U.S. EPA) concerns regarding the increases in fenceline dose as reported in the Integrated Environmental Monitoring Plan (IEMP) Status Report for the First Quarter 2000. As indicated in the status report, DOE is aware of the recent increases in thorium-230 concentrations and dose at the site fenceline. The increases in the thorium-230 concentration, and contribution to dose have been communicated to the management of the Waste Pits Remedial Action Project (WPRAP), and the project is continually reviewing their operations and monitoring data in an effort to identify and address the specific building, machinery, or activity, which is the source of these emissions. Recent fenceline thorium results (Second and Third Quarter 2000 data) from the WPTH-1 and WPTH-2 monitors suggest that efforts to lower and control fugitive emissions from the WPRAP have been successful, particularly when considering the increased level of WPRAP waste processing activity during the second and third quarters.

DOE recognizes that major contributors to dose at the fenceline are changing and is proposing modifications to the fenceline air monitoring sample and analysis program in order to improve the frequency of monitoring for thorium. The modifications will consist of using biweekly thorium analysis (in addition to the current biweekly total uranium analysis) at all IEMP monitors along the fence line. The analysis schedule for the quarterly composite samples for determining National Emission Standards for Hazardous Air Pollutants (NESHAP) compliance will continue.

Since the IEMP is currently in the process of its scheduled biennial revision, the addition of biweekly thorium analysis would be handled as an interim change to IEMP air monitoring program. Revision 2 of the IEMP, which is scheduled to be submitted to the U.S. EPA and Ohio Environmental Protection Agency (OEPA) in October 2000, will contain a complete description of the revised IEMP air monitoring program. DOE is planning to initiate the biweekly thorium analysis with the start of the Fourth Quarter 2000 sampling period.

DOE does not expect the fenceline dose to be as high as 5.8 millirem (mrem) in 2000 as estimated by the U.S. EPA. Fenceline results through the second quarter indicate that the year-to-date maximum fenceline dose is approximately 0.75 mrem and suggest that the annual fenceline dose will be in the range of 1 to 2 mrem. While this represents a substantial increase from the 1999 maximum annual dose of 0.29 mrem, it remains below the 10 mrem NESHAP limit. Furthermore, DOE believes the biweekly thorium analysis data in addition to the quarterly composite analysis data will provide sufficient data for the tracking of fenceline dose and initiating necessary programmatic actions to control emissions within the NESHAP limit.

In an effort to provide the U.S. EPA and OEPA with the most recent fenceline monitoring data, DOE will provide information on significant trends during the regularly scheduled conference calls. In addition, information on the WPRAP efforts to identify and address the sources of emissions will be discussed.

If you have any questions concerning the IEMP air monitoring program, please contact Kathleen Nickel at (513) 648-3166.

Sincerely,

Johnny Reising

FEMP:Nickel

Johnny W. Reising
Fernald Remedial Action
Project Manager

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